

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

SPARTAN BUSINESS SOLUTIONS LLC
D/B/A SPARTAN CAPITAL,

Plaintiffs,

-against-

MARQUIS CATTLE COMPANY INC.
D/B/A MARQUIS CATTLE COMPANY;
MONTANA MOUNTAIN BISON, INC.;
MCC TRUCKING LLC;
M HANGING 6 RANCH LLC D/B/ A PUMP'T;
MARQUIS CATTLE INC. and
CORY SHANNON MARQUIS,

Defendants.

Case No. 6:23-cv-06258-FPG

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the Declaration of Steven W. Wells, Esq., dated June 9, 2023, with exhibits attached thereto, and the accompanying Memorandum of Law, dated June 9, 2023, Plaintiff Spartan Business Solutions LLC d/b/a Spartan Capital (“Plaintiff”), shall make an application pursuant to 28 U.S.C §§ 1332, 1441, 1446, and 1447, and 9 U.S.C. § 1, *et seq.*, for an order to remand or, in the alternative, to compel arbitration against Defendants Marquis Cattle Company Inc. d/b/a Marquis Cattle Company, Montana Mountain Bison, Inc., MCC Trucking LLC, M Hanging 6 Ranch LLC d/b/a Pump’t, Marquis Cattle Inc., and Cory Shannon Marquis (“Defendants”), and for such other and further relief as the Court deems just and proper.

Dated: Lancaster, New York
June 9, 2023

Respectfully submitted,

WELLS LAW P.C.

By: /s/Steven W. Wells

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Counsel for Plaintiff